

ORIGINAL

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District of Hawaii

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII (ea)
Oct 21, 2020, 2:54 pm
Michelle Rynne, Clerk of Court

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UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,) CR. NO. 20-00094 LEK
)
 Plaintiff,) INDICTMENT
)
 vs.) [18 U.S.C. §§ 1343 and 1346]
)
BRANDON CHARLES SAFFEELS,)
)
 Defendant.)
)
)
)

INDICTMENT

The Grand Jury charges:

Honest Services Wire Fraud
(18 U.S.C. §§ 1343 and 1346)

Introductory Allegations

At times material to this Indictment:

1. BRANDON CHARLES SAFFEELS, the defendant, was a police officer for the Maui County Police Department (“MPD”).
2. As an MPD officer, BRANDON CHARLES SAFFEELS was responsible for, among other things, promoting public safety and enforcing criminal laws within the County of Maui. BRANDON CHARLES SAFFEELS had a duty of honesty and loyalty to the citizens of the County of Maui and the MPD to act in the public’s interest and not for his own illicit enrichment.
3. As an MPD officer, BRANDON CHARLES SAFFEELS had access to information regarding individuals’ phone numbers, addresses, and criminal histories. Access to, and the use of this information was restricted to official users acting within the scope of their official duties.

The Scheme to Defraud

4. On or about and between July 25 and July 28, 2019, both dates being approximate and inclusive, within the District of Hawaii, BRANDON CHARLES SAFFEELS, the defendant, did knowingly devise and intend to devise a scheme and artifice to defraud the citizens of the County of Maui and the MPD of the

defendant's honest and faithful services through bribery and concealment of material information.

5. It was part of the scheme and artifice to defraud that BRANDON CHARLES SAFFEELS secretly used his official position to enrich himself by soliciting sex from an individual ("Individual A") in exchange for the promise of providing Individual A with favorable official action involving Individual A's arrest on charges of operating a vehicle while under the influence of an intoxicant in MPD arrest number 19-005285 as follows:

- A. BRANDON CHARLES SAFFEELS obtained Individual A's cellular phone number during the course of his official duties as an MPD officer.
- B. BRANDON CHARLES SAFFEELS exchanged a number of text messages and engaged in a phone call with Individual A, during which BRANDON CHARLES SAFFEELS solicited sex in exchange for providing false and faulty testimony in Individual A's impending criminal trial and sabotaging the State of Hawaii's case.
- C. BRANDON CHARLES SAFFEELS attempted to hide, conceal, and cover up his misconduct and the nature and circumstances of his relationship with Individual A by lying to federal law enforcement officers in response to questioning about his solicitation.

The Wire Communications

6. On or about the dates set forth below as to each count, within the District of Hawaii and elsewhere, and for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, BRANDON CHARLES SAFFEELS, the defendant, did knowingly transmit, and cause to be transmitted, certain writings, signs, signals and sounds in interstate commerce, as set forth below as to each count:

COUNT	DATE	DESCRIPTION OF WIRE COMMUNICATION
1	7/25/2019	Text message from BRANDON SAFFEELS to Individual A stating, "I'm gonna tell u how to beat it though. So it gets dismissed."
2	7/25/2019	Text message from BRANDON SAFFEELS to Individual A stating, "Gotta do that in person though."
3	7/25/2019	Text message from BRANDON SAFFEELS to Individual A stating, "You will be ok. You need a shoulder to cry on is all and someone to hold u."
4	7/25/2019	Text message from BRANDON SAFFEELS to Individual A stating, "I will fuck up my testimony so that u get off."
5	7/28/2019	Text message from BRANDON SAFFEELS to Individual A stating, "Just come. Bring clothes."

COUNT	DATE	DESCRIPTION OF WIRE COMMUNICATION
6	7/28/2019	Text message from BRANDON SAFFEELS to Individual A stating, "Just come lol. I will come."
7	7/28/2019	Telephone call from BRANDON SAFFEELS to Individual A stating, in substance and in part, "Maybe a little bit of bad intentions. ... Maybe just a small kine bad intentions. ... You want a hug. You need to cry on somebody's shoulder. Crying makes you feel better."

All in violation of Title 18, United States Code, Sections 1343 and 1346.

DATED: October 21, 2020, in Honolulu, Hawaii.

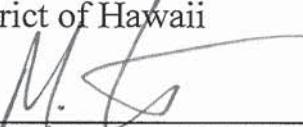
A TRUE BILL

/s/ Foreperson

FOREPERSON



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